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September 1, 2021

**(VIA ECF)**

Magistrate Judge James M. Wicks  
United States District Court  
Eastern District of New York  
100 Federal Plaza, Courtroom 1020  
Central Islip, New York 11722  
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Re: **Chambers v. County of Nassau, et al.**  
**Docket No. 19-CV-00158**  
**Request to Extend Discovery**

Dear Magistrate Judge James M. Wicks:

Our office represents Plaintiff Kristofer Chambers in above referenced matter. We write with the consent of Defendant's counsel Jennean R. Rogers to request an extension of the discovery deadline to October 29, 2021. The parties are in the process of completing paper discovery and depositions. Due to the large number of parties involved in the action, including at least four police officers requiring deposition, the parties are requesting an extension of the discovery deadline.

With an extension of the deadline, the parties will be able to complete all discovery and the depositions. Completing discovery and scheduling depositions will take some additional time due to the scheduling conflicts arising out of the officers' respective responsibilities and delays caused by the pandemic. The parties write in advance of the September 13, 2021 discovery deadline to advise the Court of the anticipated delay in completing all discovery. Accordingly, with an extension the parties will be able to timely complete all discovery and depose the parties. The next pre-trial conference is currently scheduled for November 9, 2021. The parties previously made one request for an extension of time and such request was granted.

We thank Your Honor for the attention to this matter, and should any questions arise, please contact our office at (212) 349-6099.

Very truly yours,

*/s/ Eugene Kroner*

Eugene Kroner, Esq.

CC: Jennean R. Rogers, Esq. via ECF